



TEMPORARY DRAFT

TEMPORARY DRAFT

September 6, 2000

TO: Dennis Frederick, Division of Water Quality

FROM: D. Wayne Hedberg & Doug Jensen, Minerals Reclamation Program

RE: Review Comments, Conceptual Post Closure Fluid Management Plan, North Lily Mining Company, Silver City Heap Leach Facility, M/023/007

Date of Meeting: September 6, 2000

Location: Division Offices

Time of Meeting: 9:30 - 11:00 a.m.

Participants: Dennis Frederick & Beth Wondimu, DWQ; Doug Jensen & Wayne Hedberg, DOGM.

Purpose of Meeting: To discuss North Lily Mining Company's recent Conceptual Post Closure Fluid Management Plan in order to provide a response to the operator by 9/8/00.

The above referenced staff members met at the Division offices to discuss the company's latest proposal for managing the post closure fluids draining from the reclaimed heap. The following is a list of concerns and comments that were discussed and may need to be incorporated into a joint agency response letter to the operator.

1. Beth and Dennis wondered if the proposed infiltration system would need a construction permit. Beth would check with Kiran Bhayani when she returned to the office.
2. Dennis suggested that the approved management system not be allowed to be used until the flow from the heap has dropped off significantly and has stabilized.
3. All agreed that the Conceptual Plan is lacking in details and very preliminary which makes it difficult to provide meaningful feedback and critique of the proposal.
4. All agreed that a land application proposal would not be considered for approval by either agency.
5. Post closure water quality and quantity compliance monitoring would be a component that would

0044

need to be built into the plan. A minimum of 3 years of quarterly water quality sampling (albeit at a reduced parameter rate) would be required.

6. We agreed that the final fluid management proposal must include a design provision for a monitoring port(s). We also would require a totalizing flow meter to be built into the infiltration gallery feed line. Monthly flow rates would need to be provided to the agencies.
7. We discussed possible use of the overflow pond itself as the location for installing the infiltration gallery/leach field, once the flow from the heap from the heap stabilized.
8. We agreed that the final 3 design criteria as outlined under "Outstanding Information Needs" in the proposal would need to be addressed by the operator. Of particular concern would be modeling the potential impact on ground water quality as a result of the discharge entering the infiltration system. A diminimus impact would need to be demonstrated.
9. Part of the design criteria for the infiltration gallery would be the predicted flow from the heap and the design through-put of the system.
- 10.
- 11.

We agreed to provide our comments and concerns to DWQ by end of business September 6, 2000, so that Dennis and Beth could prepare a joint agency response to North Lily and JBR Consultants by Friday, September 8th.

o:\north lily\mtgmemo.wpd